Notes ID: F66FD16DB619C6089820497E52962113
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Delivered Date: 11/29/2010 05:56 PM PDT
Subject: RE: Modeling Question

I haven't heard back from anyone on this question from Bruce Rawls. Brian, are you willing to give this a try?

From: Bellatty, James (ECY)
Sent: Thursday, November 18, 2010 11:04 AM
To: 'Cope.Ben@epamail.epa.gov'
Cc: Moore, David (ECY); Darrell, Ginny (ECY); Baldwin, Karin K. (ECY); Koch, Richard A. (ECY); Ross, James D. (ECY); Hallinan, Patrick J. (ECY)
Subject: Modeling Question

Ben: during our public meeting/hearing last week re: draft NPDES permits for the Spokane River, Bruce Rawls (Spokane County) asked a question as to whether differences in seasonal averages between facilities (ie. 36 versus 42 ppb) could be reconciled? My reply was yes, that during the upcoming 5 year permit cycle, that discharge monitoring data and information could be collected/analyzed (ie. in theory) to overcome these differences. I did not say that we would want to do that (ie. it would be expensive proposition for smaller dischargers) , but I was thinking that it should be theoretically possible (if it was necessary or appropriate). My rationale is that the waste load allocations in the TMDL and the permit limits are based, in part, on past DMR data, monitoring frequency, etc…

One set of talking points for the DO TMDL was:

The numbers are different for different dischargers because:

The long-term (March to October) limits are where there's a difference.
Dischargers sample their water quality at different frequencies. Dischargers that sample more frequently have long-term limits of 42 ppb. Dischargers that sample less frequently have long-term limits of 36 ppb.
Less frequent sampling can miss "spikes" or exceedances over the water quality limit over the

long-term.
Lower long-term (March to October) limits account for the possibility of missing the spikes in order to consistently meet the monthly average (50 ppb).
Two WA dischargers (Liberty Lake and IEP) and the three ID dischargers have the lower long-term limits. Kaiser has an even lower limit due to groundwater usage in their effluent (these assumed limits do not just apply to Idaho, as the argument may imply).

So, assuming that data variability was not a big factor (maybe not a good assumption), if we had each discharger at the same monitoring frequency for the next 5 year permit cycle, couldn't this data/information be used to put all of the dischargers at the same long term seasonal average? I am wondering if this logic is correct or whether I need to send Bruce (and others) a follow up e-mail and explanation (or maybe a retraction). I realize this is a tricky question without the benefit of more DMR data/modeling, but I wanted to make sure that I wasn't steering folks in the wrong direction. Please let me know if you have any thoughts or concerns with my logic or can confirm that my reply was conceptually correct. Thanks Ben.